

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
5	Comment 4	Executive Summary	
6	Comment 6	Executive Summary	
13	Comment 18	3	
13	Comment 19	3	
14	Comment 23	3	
15	Comment 27	3	
15	Comment 28	3	
26	Comment 70	3	
26	Comment 71	3	
27	Comment 72	3	
27	Comment 73	3	
27	Comment 74	3	
27	Comment 75	3	
27	Comment 76	3	
28	Comment 77	3	
32	Comment 91	4	
32	Comment 92	4	
69	Comment 181	4	
71	Comment 191	4	
71	Comment 192	4	
71	Comment 193	4	
71	Comment 194	4	
75	Comment 206	5	
75	Comment 207	5	Delete "It is wholly unbelievable that NCG did not observe seeps into Newtown Creek from upland sites; sheens on the water surface from both seeps and ebullition-facilitated NAPL migration are a daily occurrence."
75	Comment 208	5	
85	Comment 233	5	
86	Comment 237	5	
86	Comment 238	5	
89	Comment 244	5	Delete "For NCG to state, in this document,

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
			that they have not observed seeps and any seeps if present represent an insignificant localized source, demonstrates a lack of their credibility and their disingenuous efforts in developing a robust NCG Draft RI. It is clear that NCG will make false statements in the Draft RI in an effort to represent the conditions in the Creek in the best light for their clients and to focus on point sources."
90	Comment 245	6	
91	Comment 247	6	
91	Comment 248	6	
91	Comment 249	6	
94	Comment 257	6	
94	Comment 258	6	
95	Comment 259	6	
104	Comment 281	6	
104	Comment 282	6	
105	Comment 283	6	
105	Comment 284	6	
114	Comment 326	8	Delete "Failure to adequately account for these other loads results in an incomplete and indefensible CSM."
116	Comment 332	8	
121	Comment 345	8	Delete "For these reasons, these sections are erroneous and must be re-written when the data gaps are filled, and deficiencies and errors are corrected."
121	Comment 346	8	
245	Comment 681	App E, Figure	
248	Comment 682	App F	
248	Comment 683	App F	
248	Comment 684	App F	
249	Comment 685	App F	
249	Comment 686	App F	

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
249	Comment 687	App F	
249	Comment 688	App F	
250	Comment 689	App F, Sec 3.1.1.2	
250	Comment 690	App F, Sec 3.1.1.2	
250	Comment 691	App F, Sec 3.1.2	
250	Comment 692	App F, Sec 4.8	
251	Comment 693	App F, Sec 4.8	Delete "What is needed is low-tide groundwater samples which will represent the greatest concentration that is arriving. Three fatal flaw errors occur based on this flawed sampling:"
251	Comment 694	App F, Sec 4.8	
252	Comment 695	App F, Sec 4.8.2.1	
252	Comment 696	App F, Sec 4.8.2.2.1	
252	Comment 697	App F, Sec 4.8.2.3	
253	Comment 698	App F, Sec 4.8.3	
253	Comment 699	App F, Sec 4.8.3.1	
253	Comment 700	App F, Sec 4.8.3.2	
253	Comment 702	App F, Sec 4.8.3.2	
253	Comment 703	App F, Sec 4.8.3.2	
254	Comment 704	App F, Sec 4.9.1	
254	Comment 705	App F, Sec 4.9.1	Delete: "This statement should be removed from the text."
254	Comment 706	App F, Sec 4.9.1	
254	Comment 707	App F, Sec 4.9.1 4.9.3	
255	Comment 708	App F, Sec 4.8.3.2	
255	Comment 709	App F, Sec 4.8.3.2	
255	Comment 710	App F, Sec 5.2	
256	Comment 711	App F, Sec 5.2	
256	Comment 712	App F, Sec 5.2.1	
256	Comment 713	App F, Sec 5.2.2	
256	Comment 714	App F, Sec 5.2.3	
257	Comment 715	App F, Sec 6.4.5.1	
257	Comment 716	App F, Sec 6	

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
257	Comment 717	App F, Sec 6.4.5.3	
258	Comment 718	App F, Sec 6.4.5.3	
258	Comment 720	App F, App B	
258	Comment 721	App F, Table	
260	Comment 723	App F, Page 1, bullet list	
260	Comment 724	App F, Sec 1	
261	Comment 725	App F, Sec 1	
261	Comment 726	App F, Sec 1.2.2	
262	Comment 728	App F, Sec 2	
262	Comment 729	App F, Sec 2	
262	Comment 730	App F, Sec 2.2	
263	Comment 731	App F, Sec 3.2	
263	Comment 732	App F, Sec 3.2, Figures	
263	Comment 733	App F, Sec 3.4.1	
263	Comment 734	App F, Sec 3.4.1	
264	Comment 735	App F, Figures	
264	Comment 736	App F, Attach F-D	
264	Comment 737	App F, Sec 3.4.2	
264	Comment 738	App F, Figure	
265	Comment 739	App F, Sec 3.5.2	
267	Comment 741	App F, Sec 3.5.3.1	Delete phrase “(because the NCG seepage metering includes spurious and over extrapolated data).”
267	Comment 742	App F, Sec 3.6	Delete “Furthermore, the seepage point at the mouth of the Creek (NC266SP) is noted as being anomalous by the USGS.”
268	Comment 743	App F, Sec 3.7	
268	Comment 744	App F, Sec 3.7.1	
268	Comment 745	App F, Sec 3.7.1	
268	Comment 746	App F, Sec 3.7.1	
269	Comment 747	App F, Sec 3.7.1	
269	Comment 749	App F, Sec 3.7.2	
269	Comment 750	App F, Sec 3.2.7	

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
270	Comment 751	App F, Sec 3.2.7.1	
270	Comment 752	App F, Sec 3.7.2.2.1	
270	Comment 753	App F, Sec 3.7.2.2.1	
270	Comment 754	App F, Sec 3.7.2.2.1	
270	Comment 755	App F, Sec 4.1	
271	Comment 757	App F, Sec 4.4	Delete "There may be a need to collect additional data there to get a better understanding of the depth of the UGA." Delete "It cannot be ruled out that the Study Area may require further stratigraphic evaluation."
271	Comment 759	App F, Sec 4.5	
272	Comment 761	App F, Sec 4.5.1	
272	Comment 762	App F, Sec 4.5.2	
272	Comment 763	App F, Sec 4.5.2	
273	Comment 764	App F, Sec 4.2.5.1	
273	Comment 765	App F, Sec 4.5.2.1	
273	Comment 766	App F, Sec 4.5.2.1	
273	Comment 767	App F, Sec 4.5.2.2	
274	Comment 768	App F, Sec 4.5.2.2	
275	Comment 770	App F, Page 42, Sec 4.5.2.5	
275	Comment 771	App F, Sec 5.1	
276	Comment 772	App F, Sec 5.1.1.1	
276	Comment 773	App F, Sec 5.1.1.1	Delete "The coverage represents a quarter of the PGCA—ground-truthing and field verification are imperative for accuracy. At a minimum, a field reconnaissance to support such refinements would be expected for this level of investigation."
276	Comment 774	App F, Sec 5.1.1	
277	Comment 775	App F, Sec 5.1.1	
278	Comment 778	App F, Sec 5.1.2.2	
278	Comment 779	App F, Sec 5.1.2.3	

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
279	Comment 781	App F, Sec 5.2.2	
280	Comment 783	App F, Sec 5.2.3	
282	Comment 789	App F, Sec 6	
282	Comment 790	App F, Sec 6	
282	Comment 791	App F, Sec 6 and 7.1	
283	Comment 792	App F, Sec 6 and 7.2	
285	Comment 793	App G, Sec 1.1	
286	Comment 794	App G, Sec 2.1.1	
286	Comment 796	App G, Sec 2.1.1	
286	Comment 797	App G, Sec 2.1.1	
286	Comment 798	App G, Sec 2.1.2	
287	Comment 799	App G, Sec 2.1.2	
287	Comment 800	App G, Sec 2.1.3	
287	Comment 801	App G, Sec 3	
287	Comment 803	App G, Sec 3.1.1	
288	Comment 804	App G, Sec 3.1.1	
288	Comment 808	App G, Sec 3.3.2.1	
289	Comment 811	App G, Sec 3.3.2.6	
289	Comment 812	App G, Sec 3.3.3	
290	Comment 816	App G, Sec 3.5	
290	Comment 818	App G, Sec 3.5	
291	Comment 820	App G, Figure	
291	Comment 821	App G, Sec 3.5	
291	Comment 822	App G, Figure	
292	Comment 825	App G, Tables	
293	Comment 829	App G, Sec 3.5.2	
294	Comment 833	App G, Sec 3.7	
294	Comment 834	App G, Sec 3.7	
294	Comment 835	App G, Sec 3.7.1	
294	Comment 836	App G, Sec 3.7	
295	Comment 837	App G, Sec 3.7	
295	Comment 839	App G, Sec 3.7.2	
295	Comment 840	App G, Sec 3.7.2	

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
295	Comment 841	App G, Sec 3.7.2, page 39	
296	Comment 844	App G, Sec 3.9	
296	Comment 845	App G, Sec 3.9	
297	Comment 847	App G, Sec 4.2.2	
297	Comment 849	App G, Sec 4.2.3	
297	Comment 850	App G, Sec 4.2.3	
297	Comment 851	App G, Sec 4.2.3	
297	Comment 852	App G, Sec 4.2.3	
298	Comment 854	App G, Sec 4.4.2.2	
299	Comment 857	App G, Sec 4.5.3.2	
299	Comment 858	App G, Figures	
299	Comment 859	App G, Figures	
300	Comment 861	App G, Sec 4.5.3.5	
300	Comment 863	App G, Figures	
301	Comment 869	App G, Sec 5.2.2	
301	Comment 871	App G, Sec 5.2.7	
302	Comment 872	App G, Sec 5.3.1	
302	Comment 873	App G, Sec 5.3.3.2	
302	Comment 874	App G, Sec 5.3.3.2	
302	Comment 875	App G, Sec 5.3.2	
303	Comment 877	App G, Sec 5.3.2	
305	Comment 882	App G, Sec 5.4.1	
306	Comment 885	App G, Sec 5.4.2.2	
306	Comment 887	App G, Sec 5.5.1.2	
306	Comment 888	App G, Sec 5.5.1.2	
307	Comment 890	App G, Sec 5.5.1.3	
307	Comment 892	App G, Sec 5.5.4	Delete "The entirety of Section 5.5.4 should be removed or rewritten extensively."
308	Comment 893	App G, Sec 5.5.5	
308	Comment 895	App G, Sec 5.5.6.1.1	
309	Comment 897	App G, Sec 5.5.6.1.2	
310	Comment 900	App G, Sec 5.5.6.4.1.1	

Newtown Creek RI/FS
New York City RI Report Modeling-associated Comments
July 11, 2017

NYC Comments Page No.	NYC Comment Co.	Sec No. of RI Report	Note or Comment
311	Comment 902	App G, Sec 6.2.2	
311	Comment 905	App G, Attach G-J, Figure	
312	Comment 908	App G, Attach G-I, Figures	
312	Comment 909	App G, Attach G-K, Sec 1.1.1	
312	Comment 910	App G, Attach G-K, Sec 1.1.1	
314	Comment 916	App G, Attach G-K, Sec 1.3	
314	Comment 917	App G, Attach G-K, Sec 1.4	Delete "Taken as a whole, the uncertainty in the prop wash model remains unacceptably high and model results are not supportable, even qualitatively."